FACT SHEET

as required by LAC 33:IX.2411, for draft **Louisiana Pollutant Discharge Elimination System Permit No. LA0038407; AI 19805; PER20060001** to discharge to waters of the **State of Louisiana** as per LAC 33:IX.2311.

The **permitting authority** for the Louisiana Pollutant Discharge Elimination System (LPDES) is:

Louisiana Department of Environmental Quality
Office of Environmental Services
P. O. Box 4313
Baton Rouge, Louisiana 70821-4313

I. **THE APPLICANT IS:** City of DeRidder
Wastewater Treatment Plant
200 South Jefferson Street
DeRidder, LA 70634

II. **PREPARED BY:** Todd Franklin

DATE PREPARED: March 22, 2007

III. **PERMIT ACTION:** reissue LPDES permit LA0038407, AI 19805; PER20060001

LPDES application received: May 8, 2006

EPA has retained enforcement authority.

Previous LPDES permit effective: November 1, 2001
Previous LPDES permit expired: October 31, 2006

IV. **FACILITY INFORMATION:**

A. The application is for the discharge of treated sanitary wastewater from a publicly owned treatment works serving the City of DeRidder.

B. The permit application does indicate the receipt of industrial wastewater. The industrial dischargers include:

Name of Discharger	Flow
Presley's Septic Service	0.0009 MGD
Premo, Inc.	0.1584 MGD
Ampacet Corporation	0.065 MGD
Mead-Westvaco	0.05 MGD

C. The facility is located at 1366 Ball Road in DeRidder, Beauregard Parish.

D. The treatment facility consists of a 3.03 MGD Counter Current Extended Aeration facility consisting of an equalization basin, mechanical and manual bar screens, grit removal system, dual train extended aeration system, secondary clarifiers, post aeration and ultraviolet light disinfection.

E. Outfall 001

Discharge Location:	Latitude 30° 46′ 55″ North Longitude 93° 16′ 43″ West
Description:	treated sanitary wastewater
Design Capacity:	3.03 MGD

Type of Flow Measurement which the facility is currently using:

Parshall Flume in conjunction with an Eastech Badger Ultrasonic Sensor

V. RECEIVING WATERS:

The discharge is into an unnamed ditch; thence into Barnes Creek in Subsegment 030601 of the Calcasieu River Basin. This segment is not listed on the 303(d) list of impaired waterbodies.

Barnes Creek Subsegment 030601 was classified as an intermittent stream on July 14, 1980. As per LAC 33:IX.1123 Table 3, Barnes Creek Subsegment 030601 has the designated uses of secondary contact recreation and propagation of fish & wildlife only during the months of November through April. No uses exist for this segment of Barnes Creek during the months of May through October. Existing LDEQ procedure for classified intermittent streams allows for protection of the next downstream perennial waterbody in the determination of water quality based limits during the period that the intermittent stream does support its designated uses. Therefore, a seasonal approach to permitting water quality based parameters, priority pollutant, and toxic substances has been implemented in this permit. Conventional pollutants will be permitted in accordance with state criteria and the City of DeRidder Wasteload Allocation (90.03).

During the months of May through October, when no uses exist for Subsegment 030601, the next perennial downstream waterbody, Barnes Creek from the entrance of Little Barnes Creek to the confluence with the Calcasieu River (Subsegment 030602), will be considered in permit development. Therefore, water quality data for Subsegment 030602 of Barnes Creek will be used in determining water quality based limits during these months.

The **critical low flow** (7Q10) Subsegment 030602 of Barnes Creek is 21.67 cfs.

The **hardness value** is 114.95 mg/l and the **fifteenth percentile value for TSS** is 35.8 mg/l.

The designated uses and degree of support for Subsegment 030602 of the Calcasieu River Basin are as indicated in the table below[1/]:

Overall Degree of Support for Segment	Degree of Support of Each Use						
Partial	Primary Contact Recreation	Secondary Contact Recreation	Propagation of Fish & Wildlife	Outstanding Natural Resource Water	Drinking Water Supply	Shell fish Propagation	Agriculture
	Full	Full	Not Supported	N/A	N/A	N/A	N/A

[1/] The designated uses and degree of support for Subsegment 030602 of the Calcasieu River Basin are as indicated in LAC 33:IX.1123.C.3, Table (3) and the 2004 Water Quality Management Plan, Water Quality Inventory Integrated Report, Appendix A, respectively.

During the months of November through April, Barnes Creek, headwaters to the entrance of Little Barnes Creek (Subsegment 030601), has designated uses of secondary contact recreation and propagation of fish and wildlife. Therefore, protection of this Subsegment of Barnes Creek is required during this period. Water quality data of Subsegment 030601 was used in determining water quality based limits during these months.

The **critical low flow** (7Q10) Subsegment 030601 of Barnes Creek is 4.1 cfs.

The **hardness value** is 114.95 mg/l and the **fifteenth percentile value for TSS** is 35.8 mg/l.

The designated uses and degree of support for Subsegment 030601 of the Calcasieu River Basin are as indicated in the table below[1/]:

Overall Degree of Support for Segment	Degree of Support of Each Use						
Partial	Primary Contact Recreation	Secondary Contact Recreation	Propagation of Fish & Wildlife	Outstanding Natural Resource Water	Drinking Water Supply	Shell fish Propagation	Agriculture
	N/A	Full	Not Supported	N/A	N/A	N/A	N/A

[1/] The designated uses and degree of support for Subsegment 030601 of the Calcasieu River Basin are as indicated in LAC 33:IX.1123.C.3, Table (3) and the 2004 Water Quality Management Plan, Water Quality Inventory Integrated Report, Appendix A, respectively.

VI. ENDANGERED SPECIES:

The receiving waterbody, Subsegment 030601 of the Calcsieu River Basin, is not listed in Section II.2 of the Implementation Strategy as requiring consultation with the U. S. Fish and Wildlife Service (FWS). This strategy was submitted with a letter dated Septembetr 29, 2006, from Watson (FWS) to Brown (LDEQ). Therefore, in accordance with the Memorandum of Understanding between the LDEQ and the FWS, no further informal (Section 7, Endangered Species Act) consultation is required. It was determined that the issuance of the LPDES permit is not likely to have an adverse effect on any endangered or candidate species or the critical habitat. The effluent limitations established in the permit ensure protection of aquatic life and maintenance of the receiving water as aquatic habitat.

VII. HISTORIC SITES:

The discharge is from an existing facility location, which does not include an expansion beyond the existing perimeter. Therefore, there should be no potential effect to sites or properties on or eligible for listing on the National Register of Historic Places, and in accordance with the 'Memorandum of Understanding for the Protection of Historic Properties in Louisiana Regarding LPDES Permits' no consultation with the Louisiana State Historic Preservation Officer is required.

VIII. PUBLIC NOTICE:

Upon publication of the public notice, a public comment period shall begin on the date of publication and last for at least 30 days thereafter. During this period, any interested persons may submit written comments on the draft permit modification and may request a public hearing to clarify issues involved in the permit decision at this Office's address on the first page of the statement of basis. A request for a public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing.

Public notice published in:

Local newspaper of general circulation

Office of Environmental Services Public Notice Mailing List

For additional information, contact:

Mr. Todd Franklin
Permits Division
Department of Environmental Quality
Office of Environmental Services
P. O. Box 4313
Baton Rouge, Louisiana 70821-4313

IX. PROPOSED PERMIT LIMITS:

Subsegment 030601, Barnes Creek-Headwaters to entrance of Little Barnes Creek, and Subsegment 030602, Barnes Creek-from entrance of Little Barnes Creek to confluence with Calcasieu River, are not listed on LDEQ's Final 2004 303(d) list as impaired. However, subsegments 030601 and 030602 were previously listed as impaired for organic enrichment / low DO, for which the below TMDL has been developed. The Department of Environmental Quality reserves the right to impose more stringent discharge limitations and/or additional restrictions in the future to maintain the water quality integrity and the designated uses of the receiving water bodies based upon additional TMDLs and/or water quality studies. The DEQ also reserves the right to modify or revoke and reissue this permit based upon any changes to established TMDL for this discharge, or to accommodate for pollutant trading provisions in approved TMDL watersheds as necessary to achieve compliance with water quality standards.

The following TMDL has been established for subsegments 030601 and 030602:

Barnes Creek Watershed TMDL for Biochemical Oxygen-Demanding Substances

As per the TMDL, "the City of DeRidder was the only significant discharger located on Barnes Creek. This discharger is located in subsegment 030601. The seasonal summer dissolved oxygen standard for this subsegment is 2.0 mg/l. No reductions in permit limits for The City of DeRidder are required to maintain this seasonal standard." Therefore, no additional or more stringent limitations to address organic enrichment / low DO have been placed into the permit.

Interim Effluent Limits:

Interim limits are being proposed to allow the facility time to upgrade in order to meet the proposed limitations for Total Cadmium.

Interim limits shall begin the effective date of the permit and expire three (3) years from the effective date of the permit.

All requirements and conditions found in the final effluent limits shall apply in the interim period, with the exception of the requirements for Total Cadmium. During the interim period, the facility will only have a reporting requirement to allow the facility time to upgrade in order to meet the water quality based limit found in the Final Effluent Limits.

Effluent Characteristics	Monthly Average (lbs/day)	Daily Maximum (lbs/day)	Basis
Total Cadmium	Report	Report	Water Quality Screen indicated a need for a Water Quality Based Limit. Therefore, for monitoring and data information gathering purposes, Report is proposed in the interim period. See Appendix B-1 for additional information.

Final Effluent Limits:

OUTFALL 001

Final limits shall become effective three years from the effective date of the permit and expire on the expiration date of the permit.

Effluent Characteristic	Monthly Avg. (lbs./day)	Monthly Avg.	Weekly Avg.	Basis
$CBOD_5$	253	10 mg/l	15 mg/l	Limits are set in accordance with the previous LPDES permit, which was based on the City of DeRidder Wasteload Allocation (90.03). Limno-tech 1990.
TSS	379	15 mg/l	23 mg/l	Since there is no numeric water quality criterion for TSS, and in accordance with the current Water Quality Management Plan, the TSS effluent limitations shall be based on a case-by-case evaluation fo the treatment technology being

Effluent Characteristic	Monthly Avg. (lbs./day)	Monthly Avg.	Weekly Avg.	Basis
				utilized at a facility. Therefore, a Technology Based Limit has been established through Best Professional Judgement for the type of treatment technology utilized at this facility.
Ammonia-Nitrogen	126	5 mg/l	10 mg/l	Limits are set in accordance with the previous LPDES permit, which was based on the City of DeRidder Wasteload Allocation (90.03). Limno-tech 1990.
Dissolved Oxygen[1]	---	5 mg/l	---	Limits are set in accordance with the previous LPDES permit, which was based on the City of DeRidder Wasteload Allocation (90.03). Limno-tech 1990.

[1] This Dissolved Oxygen limit is the lowest allowable average of daily discharges over a calendar month. When monitoring is conducted, the Dissolved Oxygen shall be analyzed immediately, as per 40 CFR 136.3.

The previous LPDES permit contained water quality based limits for Total Copper and Total Zinc. As per LAC 33:IX.2707L.2.a.ii, availability of information which was not available at the time of previous permit issuance and will justify the application of less stringent effluent limitations in the proposed permit constitutes an exception to LAC 33:IX.2707.L.1, which states when a permit is renewed or reissued standards or conditions must be at least as stringent as the final limitations, standards, or conditions in the previous permit. In the previous permit, the water quality based limits were calculated using TSS values of 6.7 mg/l in the summer and 2.7 mg/l in the winter and hardness values of 21.67 mg/l in the summer and 17.5 mg/l in the winter. According to a memo from Brian Baker dated September 11, 2006 (see attached), the hardness value has been found to be 114.95 mg/l and the TSS value has been found to be 35.8 mg/l. Using laboratory data from January 2004 through May 2005, a geometric mean was found for both pollutants (see Attached). The geometric means were evaluated in a water quality screen using the up-to-date hardness and TSS values and indicated that there was no need for water quality based limits for Copper and Zinc. A review of the DMRs did reveal excursions for both Copper and Zinc for the monitoring period beginning May 2004 through May 2006. However, none of the excursions would have exceeded the water quality based limit calculated using the new data. Due to the facts listed above, water quality based limits for Total Copper and Total Zinc have been removed from the permit.

Priority Pollutants

Effluent Characteristics	Monthly Average (lbs/day)	Daily Maximum (lbs/day)	Basis
Total Cadmium			Water Quality Based Limit (see Appendix B-1)
May – October	0.44	1.04	
November – April	0.15	0.35	

The above draft priority pollutant limit for Total Cadmium is based upon the evaluation of one effluent analysis, taken from the permit application. The permittee may conduct and submit the results of three (3) or more additional effluent analyses to either refute or substantiate the presence of the above toxic pollutant. The additional analyses will be evaluated by this Office to determine if the pollutants are potentially in the effluent and if it potentially exceeds the State's water quality standards.

Other Effluent Limitations:

1) **Fecal Coliform**

The discharge from this facility is into a water body which has a designated use of Primary Contact Recreation. According to LAC 33:IX.1113.C.5.b.i, the fecal coliform standards for this water body are 200/100 ml and 400/100 ml. Therefore, the limits of 200/100 ml (Monthly Average) and 400/100 ml (Weekly Average) are proposed as Fecal Coliform limits in the permit. These limits are being proposed through Best Professional Judgement in order to ensure that the water body standards are not exceeded, and due to the fact that existing facilities have demonstrated an ability to comply with these limitations using present available technology.

2) **pH**

According to LAC 33:IX.3705.A.1., POTW's must treat to at least secondary levels. Therefore, in accordance with LAC 33:IX.5905.C, the pH shall not be less than 6.0 standard units nor greater than 9.0 standard units at any time.

3) **Solids and Foam**

There shall be no discharge of floating solids or visible foam in other than trace amounts in accordance with LAC 33:IX.1113.B.7.

Toxicity Characteristics

In accordance with EPA's Region 6 Post-Third Round Toxics Strategy, permits issued to treatment works treating domestic wastewater with a flow (design or expected) greater than or equal to 1 MGD shall require biomonitoring at some frequency for the life of the permit or where available data show reasonable potential to cause lethality, the permit shall require a whole effluent toxicity (WET) limit (*Permitting Guidance Document for Implementing Louisiana Surface Water Quality Standards*, September 27, 2001 VERSION 4).

Whole effluent biomonitoring is the most direct measure of potential toxicity which incorporates the effects of synergism of the effluent components and receiving stream water quality characteristics. Biomonitoring of the effluent is, therefore, required as a condition of this permit to assess potential

toxicity. LAC 33:IX.1121.B.3. provides for the use of biomonitoring to monitor the effluent for protection of State waters. The biomonitoring procedures stipulated as a condition of this permit are as follows:

The permittee shall submit the results of any biomonitoring testings performed in accordance with the LPDES Permit No. LA0038407, **Biomonitoring Section** for the organisms indicated below.

TOXICITY TESTS	FREQUENCY
48 Hour Definitive Toxicity Test using Daphnia pulex	1/quarter[1]
48 Hour Definitive Toxicity Test using fathead minnow (Pimephales promelas)	1/quarter[1]

[1] If there are no lethal effects demonstrated after the first year of quarterly testing, the permittee may certify fulfillment of the WET testing requirements in writing to the permitting authority. If granted, the monitoring frequency for the test species may be reduced to not less than once per year for the less sensitive species (usually *Pimephales promelas*) and not less than twice per year for the more sensitive species (usually *Daphnia pulex*). Upon expiration of the permit, the monitoring frequency for both species shall revert to once per quarter until the permit is reissued.

Dilution Series - The permit requires five (5) dilutions in addition to the control (0% effluent) to be used in the toxicity tests. These additional concentrations shall be 32%, 42%, 56%, 75%, and 100%. The Permitting Guidance for Implementing Louisiana Surface Water Quality Standards, Water Quality Management Plan Volume 3, Version 4, of September 27, 2001, states that all discharges into intermittent streams shall be required to conduct 48 hour acute toxicity tests at the critical dilution of 100% effluent for the intermittent stream. Therefore, the low-flow effluent concentration (critical low-flow dilution) is defined as 100% effluent. Results of all dilutions shall be documented in a full report according to the test method publication mentioned in the **Biomonitoring Section** under Whole Effluent Toxicity. This full report shall be submitted to the Office of Environmental Compliance as contained in the Reporting Paragraph located in the **Biomonitoring Section** of the permit.

The permit may be reopened to require effluent limits, additional testing, and/or other appropriate actions to address toxicity if biomonitoring data show actual or potential ambient toxicity to be the result of the permittee's discharge to the receiving stream or water body. Modification or revocation of the permit is subject to the provisions of LAC 33:IX.2383. Accelerated or intensified toxicity testing may be required in accordance with Section 308 of the Clean Water Act.

X. PREVIOUS PERMITS:

LPDES Permit No. LA0038407: Effective: November 1, 2001
Expired: October 31, 2006

Effluent Characteristic	Discharge Limitations		Monitoring Requirements	
	Monthly Avg.	Weekly Avg.	Measurement Frequency	Sample Type
Flow	Report	Report	Continuous	Recorder
$CBOD_5$	10 mg/l	15 mg/l	2/week	6 Hour Composite
TSS	15 mg/l	23 mg/l	2/week	6 Hour Composite
Ammonia-Nitrogen	5 mg/l	10 mg/l	2/week	6 Hour Composite
Dissolved Oxygen	5 mg/l	---	2/week	6 Hour Composite
Fecal Coliform Colonies/100 ml	200	400	2/week	Grab
pH	Range (6.0 su – 9.0 su)		2/week	Grab
	Monthly Avg.	Daily Max.		
Copper				
May – October	0.24 lb/day	0.57 lb/day	1/quarter	24 Hour Composite
November – April	0.14 lb/day	0.33 lb/day	1/quarter	24 Hour Composite
Zinc				
May – October	1.97 lb/day	4.68 lb/day	1/quarter	24 Hour Composite
November – April	1.12 lb/day	2.65 lb/day	1/quarter	24 Hour Composite
Biomonitoring				
Pimephales promelas	Report	Report	1/quarter	24 Hour Composite
Ceriodaphnia dubia	Report	Report	1/quarter	24 Hour Composite

The permit contains biomonitoring.
The permit contains pollution prevention language.

XI. ENFORCEMENT AND SURVEILLANCE ACTIONS:

A) Inspections

A review of the files indicates the following most recent inspections performed for this facility.

Date – June 14, 2004
Inspector - LDEQ
Findings and/or Violations -

1. The Eastech Badger flow meter was last calibrated on May 21, 2003. The meter was calculated to have a % error of 8.89.
2. Exceedances over the last twelve months: there was a fecal coliform excursion in October 2003 and a Zinc excursion in second quarter of 2004.
3. Permittee needs to specify a location where grabs / composites are taken.

Date – June 22, 2005
Inspector - LDEQ
Findings and/or Violations -

1. Records and DMRs from June 2004 to May 2005 were reviewed. A DMR calculation check was performed for the month of December 2004 on TSS. It was discovered that for the months of October 2004 to January 2005, the averages and loading calculations were improperly calculated.
2. The facility is keeping calibration logs for the pH meter, dissolved oxygen meter, and composite sampling.
3. The DMR for February through April 2005 revealed permit excursions for Copper and Zinc.

Date – January 25, 2006
Facsimile from the City of DeRidder
Findings and/or Violations –

Hurricane Impact Damage Audit revealed that the facility's treatment plant has returned to pre-hurricane operational status.

B) Compliance and/or Administrative Orders

A review of the files indicates the following most recent enforcement actions administered against this facility:

LDEQ Issuance:

Compliance Order
Enforcement Tracking No. WE-C-03-0539
Date Issued – November 24, 2003
Findings of Fact:

1. The Respondent owns and/or operates a sewage treatment plant located at 1366 Ball Road off of US Highway 171 in DeRidder, Beauregard Parish, Louisiana. The Respondent was issued LPDES permit LA0038407, which became effective November 1, 2001, with an expiration date of October 31, 2006. LPDES permit LA0038407 authorizes the Respondent to discharge treated sanitary wastewater into a parish drainage ditch; thence into Barnes Creek; thence into the Calcasieu River, all waters of the state. Additionally, Part II, Section C. of the LPDES permit LA0038407 requires to the City of DeRidder to implement an approved Industrial Pretreatment Program to regulate the contribution of wastewater into the POTW from Industrial Users to ensure compliance with applicable pretreatment standards and requirements.
2. An audit of the Respondent's pretreatment program on September 3-4, 2002, and a subsequent file review on October 7, 2003, revealed the City of DeRidder failed to utilize approved test methods during the 2001 annual compliance sampling and analysis event for International Paper and Westvaco. Specifically, SW-846 test methods were used to analyze the Base/Neutral/Acids (BNA) compounds in lieu of Standard Methods for the Examination of Water and Wastewater test methods.
3. An inspection on June 5, 2003, revealed the Respondent failed to submit

DMRs to the Department in a timely manner as required by LPDES permit LA0038407. Specifically, the Respondent submitted DMRs to the Office of Environmental Compliance Enforcement Division, but failed to submit monthly DMRs to the Surveillance Division's Southwest Regional Office for the monitoring periods of September 2002 through June 2003. The Respondent submitted the delinquent DMRs to the Southwest Regional Office on August 14, 2003.

4. An inspection on June 5, 2003, and a subsequent file review on October 7, 2003, revealed effluent limitation violations as reported by the Respondent on DMRs. The DMR for November 2002 through January 2003 listed one copper violation. The DMR for February 2003 through April 2003 listed two copper violations.
5. A file review on October 14, 2003, revealed that the Respondent failed to submit a noncompliance report (NCR) to the Department as required by LPDES permit LA0038407. Specifically, the Respondent failed to submit a NCR for the monthly average exceedance of copper as reported on the November 2002 through January 2003 DMR.

Order:

1. To immediately take any and all steps necessary to meet and maintain compliance with LPDES permit LA0038407.
2. To submit to the Enforcement Division a written report that includes a detailed description of the circumstances surrounding the cited violations and actions taken or to be taken to achieve compliance with this Compliance Order

Warning Letter
Enforcement Tracking No. WE-L-04-0970
Date Issued – August 4, 2004

Warning Letter
Enforcement Tracking No. WE-L-04-0987
Dated Issued – August 10, 2004

Warning Letter
Enforcement Tracking No. WE-L-05-0527
Dated Issued – December 12, 2005

C) DMR Review

A review of the discharge monitoring reports for the period beginning May 2004 through May 2006 has revealed the following violations:

Parameter	Outfall	Period of Excursion	Permit Limit	Reported Quantity
Fecal Coliform, Weekly Avg.	001	February 2006	400 col./100 ml	678 col./100 ml
Total Copper, Monthly Avg.	001	February – April 2005	0.14 lb/day	0.31 lb/day
Total Copper, Daily Max.	001	February – April 2005	0.33 lb/day	0.43 lb/day

Total Zinc, Monthly Avg.	001	February – April 2005	1.12 lbs/day	4.02 lbs/day
Total Zinc, Daily Max.	001	February – April 2005	2.65 lbs/day	5.24 lbs/day
Total Copper, Monthly Avg.	001	November 2005 – January 2006	0.14 lb/day	0.34 lb/day
Total Copper, Daily Max.	001	November 2005 – January 2006	0.33 lb/day	0.34 lb/day
Total Zinc, Monthly Avg.	001	November 2005 – January 2006	1.12 lbs/day	1.43 lbs/day

XII. ADDITIONAL INFORMATION:

The Department of Environmental Quality reserves the right to impose more stringent discharge limitations and/or additional restrictions in the future to maintain the water quality integrity and the designated uses of the receiving water bodies based upon additional water quality studies and/or TMDLs. The DEQ also reserves the right to modify or revoke and reissue this permit based upon any changes to established TMDLs for this discharge, or to accommodate for pollutant trading provisions in approved TMDL watersheds as requested by the permittee and/or as necessary to achieve compliance with water quality standards. Therefore, prior to upgrading or expanding this facility, the permittee should contact the Department to determine the status of the work being done to establish future effluent limitations and additional permit conditions.

Final effluent loadings (i.e. lbs/day) have been established based upon the permit limit concentrations and the design capacity of 3.03 MGD.

Effluent loadings are calculated using the following example:

$CBOD_5$: 8.34 gal/lb x 3.03 MGD x 10 mg/l = 253 lb/day

At present, the Monitoring Requirements, Sample Types, and Frequency of Sampling as shown in the permit are standard for facilities of flows between 1.00 and 5.00 MGD.

Effluent Characteristics		Monitoring Requirements Measurement Frequency	Sample Type
Flow		Continuous	Recorder
$CBOD_5$		2/week	6 Hr. Composite
Total Suspended Solids		2/week	6 Hr. Composite
Ammonia-Nitrogen		2/week	6 Hr. Composite
Dissolved Oxygen		2/week	Grab
Fecal Coliform Bacteria		2/week	Grab
Total Cadmium		1/quarter	24 Hr. Composite
Biomonitoring	Ceriodaphnia dubia	1/quarter	24 Hr. Composite
	Pimephales promelas	1/quarter	24 Hr. Composite
pH		2/week	Grab

The permittee shall achieve compliance with the effluent limitations and monitoring requirements specified for discharges in accordance with the following schedule:

ACTIVITY	DATE
Achieve Interim Effluent Limitations and Monitoring Requirements	Effective date of the permit
Achieve Final Effluent Limitations and Monitoring Requirements	Three years from the effective date of the permit

The permittee shall achieve compliance with the final effluent limitations specified for Total Cadmium within three years of the effective date of this permit.

The permittee shall initiate and continue ongoing activities designed to achieve sustained compliance with final effluent limitations for Total Cadmium no later than three years after the effective date of this permit.

The permittee shall submit a progress report outlining the status of the activities on a yearly basis until compliance is achieved.

No later than fourteen calendar days following the date for compliance for Total Cadmium, the permittee shall submit a written notice of compliance or noncompliance.

Pretreatment Requirements

The City of DeRidder began implementing an approved pretreatment program on September 25, 1987. This program was modified on January 22, 1993 (NPDES modification effective February 23, 1993) and June 17, 1999, to incorporate revised Technically Based Local Limits (TBLLs). The pretreatment program was subsequently modified on March 23, 2005, to incorporate revised TBLLs, and approval of this pretreatment modification was extended by means of a minor modification of LPDES Permit LA0038407, which became effective September 1, 2005. A pretreatment audit of this program was conducted on September 12 – 14, 2006, and it indicated that the program is being implemented in a manner sufficient to regulate the industries listed above.

Therefore, it is recommended that LDEQ Option 2A Pretreatment language be included in LPDES Permit LA0038407. This recommendation is in accordance with 40 CFR Part 403 regulations, the General Pretreatment Regulations for Existing and New Sources of Pollution contained in LAC title 33, Part IX, Chapter 61, and the Best Professional Judgement of the reviewer.

Pollution Prevention Requirements

The permittee shall institute or continue programs directed towards pollution prevention. The permittee shall institute or continue programs to improve the operating efficiency and extend the useful life of the facility. The permittee will complete an annual Environmental Audit Report **each year** for the life of this permit according to the schedule below. The permittee will accomplish this requirement by completing an Environmental Audit Form which has been attached to the permit. All other requirements of the Municipal Wastewater Pollution Prevention Program are contained in Part II of the permit.

The audit evaluation period is as follows:

Audit Period Begins	Audit Period Ends	Audit Report Completion Date
Effective Date of Permit	12 Months from Audit Period Beginning Date	3 Months from Audit Period Ending Date

XIII TENTATIVE DETERMINATION:

On the basis of preliminary staff review, the Department of Environmental Quality has made a tentative determination to reissue a permit for the discharge described in this Statement of Basis.

XIV REFERENCES:

Louisiana Water Quality Management Plan / Continuing Planning Process, Vol. 8, "Wasteload Allocations / Total Maximum Daily Loads and Effluent Limitations Policy," Louisiana Department of Environmental Quality, 2005.

Louisiana Water Quality Management Plan / Continuing Planning Process, Vol. 5, "Water Quality Inventory Section 305(b) Report," Louisiana Department of Environmental Quality, 1998.

Louisiana Administrative Code, Title 33 - Environmental Quality, Part IX - Water Quality Regulations, Chapter 11 - "Louisiana Surface Water Quality Standards", Louisiana Department of Environmental Quality, 2004.

Louisiana Administrative Code, Title 33 - Environmental Quality, Part IX - Water Quality Regulations, Subpart 2 - "The LPDES Program", Louisiana Department of Environmental Quality, 2004.

Low-Flow Characteristics of Louisiana Streams, Water Resources Technical Report No. 22, United States Department of the Interior, Geological Survey, 1980.

Index to Surface Water Data in Louisiana, Water Resources Basic Records Report No. 17, United States Department of the Interior, Geological Survey, 1989.

LPDES Permit Application to Discharge Wastewater, City of DeRidder, Wastewater Treatment Plant, May 8, 2006.